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7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ALLEN WILLIAM KOON,

14 Defendant.  
15

Case No. 2:16-MJ-126-PAL

**STIPULATION TO CONTINUE**  
**PRELIMINARY HEARING**  
(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Lisa Cartier-Giroux, Assistant United States Attorney, counsel for  
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel  
19 Lazo, Assistant Federal Public Defender, counsel for Allen William Koon, that the Preliminary  
20 Hearing currently scheduled on April 4, 2016, be vacated and continued to a date and time  
21 convenient to the Court, but no earlier than thirty (30) days.  
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1 This Stipulation is entered into for the following reasons:

2 1. The parties are in the process of negotiating a pre-indictment resolution.  
3 Additional time is needed to finalize the terms of the agreement.

4 2. The defendant is incarcerated but does not object to the continuance.

5 3. Additionally, denial of this request for continuance could result in a  
6 miscarriage of justice.

7 This is the second request for continuance filed herein.

8 DATED this 24<sup>th</sup> day of March, 2016.

9  
10 RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

11  
12 */s/ Raquel Lazo*  
By \_\_\_\_\_  
13 RAQUEL LAZO  
14 Assistant Federal Public Defender

*/s/ Lisa Cartier-Giroux*  
By \_\_\_\_\_  
LISA CARTIER-GIROUX  
Assistant United States Attorney

1  
2 UNITED STATES DISTRICT COURT  
3 DISTRICT OF NEVADA

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 ALLEN WILLIAM KOON,

8 Defendant.  
9

Case No. 2:16-MJ-126-PAL

**ORDER**

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11 Based on the Stipulation of counsel and good cause appearing,

12 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled  
13 on April 4, 2016 at the hour of 4:00 p.m., be vacated and continued to May 5, 2016, at the  
14 hour of 4:00 p.m.

15 DATED this 25th day of March, 2016.

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18 UNITED STATES MAGISTRATE JUDGE  
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